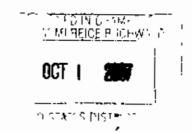
Greenberg Traurig

James W. Perkins, Esq (212) 801-3188 perkinsi@gtlaw.com



September 28, 2007

BY HAND

Honorable Naomi Reice Buchwald United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Compañia del Bajo Caroni (Caromin), C.A. v. Bolivarian Republic of Venezuela Case No. 07 CV 3179 (NRB)

Dear Judge Buchwald:

We are counsel to Plaintiffs in the above-referenced action that is now pending before the Court. We are writing to request an extension of time until October 12, 2007 to file Plaintiffs' Opposition to Defendants' Motion to Dismiss the Complaint. We would have made this request earlier than today since we were previously advised that the opposition papers were due on October 1, 2007. We learned yesterday, however, that the papers were actually calendared for today, September 28, 2007.

Plaintiffs seek this extension of time to finalize their opposition papers which includes translating documents from Spanish into English, and coordinating work among lawyers in several jurisdictions.

Opposing counsel has consented to this extension and Plaintiff's have not previously requested an extension to file its opposition papers.

James W. Perkins

Respectfully submitted.

cc: Kenneth S. Leonetti, Esq. (via email)

Paul S. Reichler, Esq. (via email)

Ronald E.M. Goodman, Esq. (via email)

Janis Brennan, Esq. (via email)

Ronald W. Kleinman, Esq. (via email)

Steven M. Schneebaum, Esq. (via email)

Roberto Martinez, Esq. (via email)

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